

## Remarks/Arguments

In the non-final Office Action mailed on May 25, 2006, the Examiner rejected claims 1, 4-6, 9-11 and 14-15 under 35 USC §103(a) as unpatentable over Koana (US Patent 6,888,641) in view of Simpson (US Patent 6,453,129). The Examiner rejected claims 2-3, 7-8 and 12-13 as unpatentable over Koana (US Patent 6,888,641) and Simpson (US Patent 6,453,129) in view of commonly known prior art at the time of the invention.

Applicants respectfully traverse the rejections and request reconsideration and withdrawal thereof. Applicants have amended various claims for editorial clarity and to better protect the invention.

### *35 USC §103(a) Rejection of Claims 1-15*

The 35 USC §103(a) rejection of claims 1-15 over Koana in view of Simpson variously with official notice of certain features is traversed as this combination of references does not describe or enable all of the limitations of the presently claimed invention. Further, the Examiner has not provided a prima facie case of obviousness or a motivation to combine the references. The rejections will be discussed in regard to independent amended claim 6 as exemplary of the shortcomings of the rejection.

The present application is related to a system and method for operating a printing system in a multi-printer environment. Typically, each printer manufacturer has a unique set of device dependent printer commands to support printer options, such as covers, paper substitutions, finishing options, etc. Current print job ticketing solutions are generally printer or printer-family specific such that any ticketing settings will only work on a small set of printers. This forces an operator to re-ticket a job every time it is to be printed on a printer from a different printer family. The present application allows a user to select desired options with respect to a print source file in a device independent manner. Later, when a printer is selected, the print application according to the present application reads the job ticket and a printer capability file and converts the device independent attributes from the job ticket into device specific printer commands. By contrast, Koana discloses a system for selecting a printer for the operator which can perform printing the file based on an operator selected desired functionality of the printer.

At least one recitation of amended claim 6 not disclosed by Koana and Simpson is a step for allowing an operator to select for a specific print job a device independent set of desired printer options, wherein the device independent set of desired printer options map to at least one printer specific command for at least one printer of the plurality of printers. The presently  
5 claimed method allows a user to select desired options with respect to a print source file, such as a .PDF file or a file in any other printable format, in a device independent manner. Selected options are stored in a device independent way in a job ticket. Later, when the user selects a printer, the print application according to the invention reads the job ticket and a printer capability file associated with the selected printer, and converts the device-independent attributes  
10 from the job ticket into device specific printer commands used by the printer to print the file. Thus, the printer capability file is not used just for determining whether the selected printer can print the file, but the printer capability file also stores specific instructions for the printer.

By contrast, the combination of Koana and Simpson discloses determining a printer based on user-specified selection conditions, but does not discuss converting from a device  
15 independent description into printer-specific commands. Koana discloses the selection condition data designated by an operator is information related to an output requirement considered by the printer driver in order to select a printer (Col 4, lines 44-47). The selection condition data of Koana does not correspond to the claimed method comprising mapping device independent set of desired printer options to specific printer command formats.

Another recitation of amended claim 6 not disclosed by Koana and Simpson is converting  
20 the device independent options to printer specific commands. Device independent options of the presently claimed method are used to store selected user options in a device independent manner and mapped to device specific printer commands. Thus, the operator does not set the specific printer commands for the specific device, and the printing options are transparently converted  
25 into the correct device dependent printer commands for the selected printer.

The Examiner argues that Col 6, lines 30-32 of Koana is equivalent to the recited step of converting from a device independent description into print specific commands of the presently claimed method of claim 6. However, the cited passage discloses if the "print data" needs to be converted to conform to the selected printer, such conversion is performed (Col 6, lines 30-32).  
30 Koana does not disclose or reasonably suggest converting printing options to conform to printer

specific commands. As disclosed by Koana, "print data" is given in a predetermined form, e.g. PDL (Page Description Language) (Col 1, lines 27-28). On the other hand, Koana discloses selection condition data, which is designated by an operator and considered by the printer driver in order to select a printer (Col 4, lines 44-47). Examples of the selection condition data are the  
5 printer which completes execution of a print job in the shortest time period, a printer capable of color printing, a printer capable of both-sides printing, a printer capable of using the printer paper size designated by the print job and so on (Col 4, lines 47-52). Thus, the print data as disclosed by Koana is not equivalent to the device independent printer options of the presently claimed method. Further, Koana discloses converting the print data to conform to the selected  
10 printer (Col 6, lines 30-32), but does not disclose converting any selection data used for selecting the printer to conform to the printer.

Applicants maintain that the method of claim 6 is novel and also non-obvious over Koana in view of Simpson and over all art of record (considered individually or in any combination). The 35 USC §103(a) rejections of amended independent claims 1 and 11 were based on similar  
15 reasoning by the Examiner and are traversed for at least the same reasons as discussed above for amended claim 6. These same arguments apply to dependent claims 2-5, 7-10, and 12-14 as dependent from allowed base claims. In addition, claims 2-5, 7-10, and 12-14 recite additional limitations not disclosed by the combination of Koana and Simpson.

Applicants have added claims 16-20 further reciting selecting the independent printer  
20 options based on an operator selected specified printer.

***Conclusion***

Applicants have addressed each of the Examiners concerns and have amended various claims for editorial clarity to better protect the invention. Applicants have traversed the rejection of all claims 1-15 under 35 USC §103. Applicants have added claims 16-20 to better protect the invention. Applicants respectfully request reconsideration and withdrawal of all outstanding objections and rejections.

Though Applicants have added claims 16-20, 20 claims were originally paid for and hence no additional fees are believed due. Should any issues remain, the Examiner is encouraged to telephone the undersigned attorney.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Daniel N. Fishman', is written over a horizontal line.

Daniel N. Fishman #35,512  
Duft Bornsen & Fishman, LLP  
1526 Spruce Street, Suite 302  
Boulder, CO 80302  
(303) 786-7687  
(303) 786-7691 (fax)